



PACIFIC WORKERS'
THE LAWYERS FOR INJURED WORKERS
Workers' Compensation - Personal Injury

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March 9, 2021

Dr. Adam Stoller
Remedy Medical Group
490 Post Street, Suite 901
San Francisco, CA 94102

Re: Jonathan Shockley v. Cardionet LLC
WCAB ADJ12031731
DOI CT 06/25/2018 - 02/15/2019
Claim No. 7173815490

Dear Dr. Stoller:

My office represents the applicant, *Jonathan Shockley*. Thank you for your participation in this matter as the QME. Mr. Shockley is now 42-years old and was employed by Cardionet LLC as a as an EKG technician at the time of his CT injury.

In Applicant's view, the main issue for this exam is:

- Work restrictions. In particular, Mr. Shockley is extremely concerned about the requirement of performing computer work; and
- Whether the delay in treatment, which resulted from the premature discharge by Dr. O'Lang and the subsequent delay in accepting the cervical spine based upon your reporting should warrant an add-on up to 3% WPI for the delay of treatment.

The claim is Accepted for bilateral carpal tunnel and the neck.

Mr. Shockley is treating with Dr. Babak Jamasbi, who has provided the following industrial diagnoses as of 03/04/2021:

1. Cervical disc disorder with radiculopathy, unspecified cervical region;
2. Other soft tissue disorders related to use, overuse and pressure right upper arm;
3. Other soft tissue disorders related to use, overuse and pressure left upper arm;
4. Other soft tissue disorders related to use overuse and pressure right forearm; and
5. Lesion of ulnar nerve, unspecified upper limb

Restrictions: Dr. Jamasbi finds restrictions of limiting repetitive activities using upper extremities to one hour in an 8-hour shift; light computer work for up to one hour for an 8-hour shift; and no lifting, pushing, or pulling greater than 5 pounds.

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He has seen Dr. Gordon for a surgical consult for the hands/wrists/upper extremities; however, it was Dr. Gordon's opinion that Mr. Shockley was not a surgical candidate. Subsequently, he was seen by Dr. Solsar for a neck surgery consult. However, Dr. Solsar did not find Mr. Shockley to be a surgical candidate.

The defendants should have forwarded medical records for your review. Please notify the parties if you require any additional information such as reports, diagnostics, job function analysis, etc. Once you have reviewed the medical record and obtained a thorough history from the Applicant, please issue a comprehensive report addressing the issues below. Please note, the WCAB will require that your reports be substantial evidence. In turn, this means that you must prove not only your **findings**, but also your **reasoning** in reaching those findings, and even one step further – the **basis** for your findings reasoning. These three steps (the reasoning, the findings, and the basis) are critical in having your report be held as substantial evidence.

Thank you for your continued participation as the QME in this matter.

Very truly yours,
PACIFIC WORKERS' COMPENSATION LAW CENTER



Zachary Kweiler, Esq.
ZK/SM

Re: *Jonathan Shockley v. Cardionet LLC*
ADJ: *ADJ12031731*

PROOF OF SERVICE

I, the undersigned, am over 18 years of age and not a party to the within-entitled action. I am employed at and my business address is Pacific Workers, 333 Hegenberger Road, Suite 504, Oakland, CA 94621.

On March 9, 2021 I served the following:

AA Cover Letter to Dr. Stoller,

BY MAIL: I am readily familiar with the firm's practice for collecting and processing mail with the U.S. Postal Service. Under that practice, mail would be deposited with the U.S. Postal Service that same day with postage thereon fully prepaid at Oakland, California in the ordinary course of business, addressed as follows, unless otherwise noted:

BY FACSIMILE: I served a true and correct copy of the document(s) listed above via Facsimile to the following facsimile number(s). Said transmission was reported complete without errors.

Amy Olson
Colantoni Collins San Francisco
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Ladera Ranch, CA 92694
Fax: 415-278-9744

Dr. Adam Stoller
Remedy Medical Group
490 Post St Ste 900
San Francisco, CA 94102
Fax: 650-306-0250

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on March 9, 2021 at Oakland, California.



Sara Guzman